

2. Motion for a Protective Order

- a. The parties should be prepared to argue why a protective order is necessary and, if so, its proposed scope

In advance of the Rule 16 conference, the parties shall meet and confer regarding all of the aforementioned topics and attempt to resolve any pending disputes. In addition, the parties should discuss whether depositions or requests for production should be handled in tiers or phases.

Following the parties' meet and confer, and no later than **three days** in advance of the hearing, the parties shall provide the Court with:

1. A copy of all draft discovery requests, including a written list of potential deponents with a summary identifying each individual or entity and the knowledge possessed.
2. All disclosures that have been previously served pursuant to Rule 26(a)(1), if any.¹
3. A notice identifying all unopposed depositions and/or other discovery requests such that the court may resolve only the issues that remain in dispute.

It is so ORDERED.

SIGNED this 11th day of September, 2019.



XAVIER RODRIGUEZ
UNITED STATES DISTRICT JUDGE

¹ In the event the parties have not completed such disclosures, the parties should complete them prior to the hearing.